

**U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:
Timothy M Hollinger

Debtors.

:
:
:
:
:
:

Case No.: 21-10199-mdc
Chapter 13

**DEBTOR'S RESPONSE TO THE CHAPTER 13 STANDING TRUSTEE'S
MOTION FOR DISMISSAL**

Sirs:

The Debtor, by and through his attorney, George R Tadross, hereby responds to the Chapter 13 Trustee's Motion to Dismiss and in support thereof states the following:

1. The Debtor will be making a plan payment to the Chapter 13 Trustee by April 23, 2021 and the Plan will be amended.
2. The Debtor was unable to make the plan payments due to the delay in receiving unemployment.

WHEREFORE, the Debtor requests this Honorable Court Order deny Chapter 13 Trustee's Motion for Dismissal or such other relief that this Court deems just and proper.

Dated: April 15, 2021

/s/ George R Tadross

George R Tadross, Esquire
128 Chestnut Street, Suite 204
Philadelphia, PA 19106
215-500-5000 (phone)
267-885-2377 (fax)
Attorney for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following: William C Miller ecfmails@ph13trustee.com, and United States Trustee at USTPRegion03.PH.ECF@usdoj.gov.

DATED: April 15, 2021

/s/ George R Tadross

George R Tadross, Esquire
128 Chestnut Street, Suite 204
Philadelphia, PA 19106
215-500-5000 (phone)
267-885-2377 (fax)
Attorney for Debtor